

Furnisher Readiness Checklist

Preparing for changes to the CFPB Complaint Portal

The CFPB complaint process is evolving — and complaint volume, duplication, and scrutiny are all in motion. The furnishers best positioned for what's next are the ones who can quickly prove what they reported, what was disputed, what they investigated, and what they did about it. Use this self-assessment to pressure-test your readiness today.

1 Complaint & Dispute Intake

- ☐ Every complaint and dispute is captured in a single system of record, across all channels (CFPB portal, direct, CRA/ACDV, e-OSCAR).
- ☐ You can distinguish legitimate disputes from duplicative, automated, or abusive submissions.
- ☐ Intake data is time-stamped and tied to the specific tradeline and consumer.

3 Data Accuracy at the Source

- ☐ You proactively scan furnished data for Metro 2 errors before they generate disputes or complaints.
- ☐ Known error patterns (duplicates, date inconsistencies, status conflicts) are monitored, not just fixed one-off.
- ☐ Corrections flow back to all bureaus consistently and are verified.

5 Timeliness & Compliance

- ☐ Investigations and responses reliably meet FCRA timeframes.
- ☐ You track dispute and complaint aging and flag at-risk items before deadlines lapse.
- ☐ Your process aligns with current FCRA, Reg V, and applicable CFPB expectations.

2 Investigation Quality

- ☐ Every dispute triggers a documented, reasonable investigation — not a template response.
- ☐ Investigators can see the full tradeline history, not just the disputed field.
- ☐ Investigation outcomes are consistent for similar fact patterns across your team.

4 Defensibility & Audit Trail

- ☐ For any account, you can produce in minutes what was reported, disputed, investigated, and acted upon.
- ☐ Your audit trail would stand up to an examiner, regulator, or court.
- ☐ Consumer and CRA communications are accurate and consistent with investigation findings.

6 Trend Visibility

- ☐ You can see which tradelines, products, or data fields drive the most disputes and complaints.
- ☐ Recurring root causes are escalated and fixed upstream, not just resolved case-by-case.
- ☐ Leadership receives regular reporting on furnishing and dispute risk.

HOW DID YOU SCORE? (18 ITEMS TOTAL)

16-18 Strong

Well positioned for increased scrutiny and portal changes.

10-15 Gaps

Solid foundation. Prioritize defensibility and root-cause fixes.

Under 10 Elevated Risk

Upstream data accuracy and audit-trail readiness should be immediate priorities.

Many institutions use the **Data Quality Scanner** to catch furnishing and dispute risks earlier, strengthen audit trails, and improve defensibility across the full tradeline lifecycle.

[See it in action →](#)